

13. CONDUCT OF OPERATIONS

13.1 ORGANIZATIONAL STRUCTURE

13.1.1 MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION

This section provides information relative to the management and technical support organizations, their functions and responsibilities, and the qualifications of personnel participating in the facility design, design review, design approval, construction management, testing, maintenance, operation, modification, and decommissioning of the plant.

13.1.1.1 Corporate Structure

Southern California Edison (SCE) is the Operator of the San Onofre Nuclear Generating Station (SONGS). SCE is a subsidiary of Edison International (EIX). The ultimate responsibility for operating, maintaining, repairing, inspecting, testing, and modifying SONGS rests with the Edison International (EIX) President and Chief Executive Officer (CEO). The CEO of SCE reports to the President and CEO of EIX, and has responsibility for SCE. The Vice President Decommissioning and Chief Nuclear Officer (CNO) is directly responsible for the Nuclear Organization, reporting to the CEO of SCE. The Nuclear Site Management Organization chart is provided as Appendix A to the SONGS Decommissioning Quality Assurance Program (DQAP).

The Vice President Decommissioning and CNO is responsible for overall plant management of SONGS Units 1, 2, and 3, and the Independent Spent Fuel Storage Installation (ISFSI). The CNO is responsible for the safe and reliable operation, maintenance, testing, and training at SONGS. The CNO may delegate responsibilities to one or more qualified individuals to facilitate management of the station and plant operations as well as other areas not specifically discussed in the UFSAR (DSAR).

13.1.1.2 Engineering

The Manager of Engineering reports to the CNO and has responsibility for providing engineering support for the site. The engineering staff requests and coordinates support from other departments in the company, or from outside consultants and engineering firms, as needed.

13.1.1.3 Nuclear Oversight, Nuclear Regulatory Affairs, and Nuclear Safety Concerns

The Director, Nuclear Oversight, Nuclear Regulatory Affairs (NRA) and Nuclear Safety Concerns (NSC), reports to the VP Decommissioning and CNO.

13.1.1.3.1 Nuclear Oversight

Nuclear Oversight reports to the Director Nuclear Oversight, NRA, and NSC and is responsible for the establishment and execution of the Quality Assurance Program in compliance with 10 CFR 50, Appendix B. The Quality Assurance Program is described in the SONGS Decommissioning Quality Assurance Program (DQAP), which is common to all three units. The DQAP satisfies the requirements of 10 CFR Appendix B, and provides control over activities affecting quality to an extent consistent with their importance to ensure safety and compliance.

Nuclear Oversight is responsible for establishing quality assurance policies, goals, and objectives and ensuring that these policies are followed and that the goals and objectives are achieved. Nuclear Oversight is also responsible for the development, maintenance, and surveillance of the DQAP, surveillance of Important to Safety activities, and has the authority to stop work.

13.1.1.3.2 Nuclear Regulatory Affairs

The NRA Manager reports to the Director Nuclear Oversight, NRA, and NSC, and is delegated the overall responsibility for licensing and nuclear regulatory compliance functions. NRA is responsible for maintaining licensing documents, submitting routine regulatory agency reports, and developing strategies for addressing U. S. Nuclear Regulatory Commission issues.

13.1.1.3.3 Nuclear Safety Concerns

Nuclear Safety Concerns are investigated by personnel reporting to the Director Nuclear Oversight, NRA, and NSC. The Nuclear Safety Concerns Program supports the Safety Conscious Work Environment (SCWE) in which workers feel free to raise concerns both to SCE and the Nuclear Regulatory Commission (NRC) without fear of retaliation. SCE's policy addresses two specific concepts: 1) A SONGS Nuclear Safety Culture, which is this organization's values and behaviors modeled by its leaders and internalized by its members that serves to make nuclear safety the overriding focus, and; 2) To build and maintain a strong nuclear safety culture, a key component is the establishment and maintenance of effective lines of communication for safety concerns such that workers are encouraged to raise concerns and that such concerns are promptly reviewed, properly prioritized, and resolved with timely feedback to workers.

13.1.2 OPERATING ORGANIZATION

13.1.2.1 Plant Manager

The Plant Manager has ultimate responsibility for the safe operation of SONGS Units 2 and 3 in the permanently defueled condition. The Plant Manager is responsible for:

- Operations & Training
- Maintenance & Work Control

San Onofre 2&3 UFSAR
(DSAR)

CONDUCT OF OPERATIONS

- Radiation Protection, Chemistry, & Environmental
- Emergency Preparedness Planning
- Security

13.1.2.1.1 Operations Manager

The Operations Manager reports directly to the Plant Manager and has the responsibility for operating the SONGS facility. The Operations Manager also has responsibility for Fire Protection (Fire Brigade), Operations Work Control, Training, Procedures and Records Management.

13.1.2.1.1.1 Operation Supervision and Operating Shift Crews

The Operations Manager may delegate specific duties to other managers and supervisors as discussed below. Unit on-duty operating shift crews are composed as indicated in Permanently Defueled Technical Specifications Section 5.2.2 and meet the requirements outlined in the technical specification describing the facility staff.

- 1) A Certified Fuel Handler (CFH) will serve as the Shift Manager with management responsibility for the facility.
- 2) The minimum staff for the facility consists of the CFH in the position of Shift Manager with oversight for both units and ISFSI and a Certified Operator (CO) for each unit. The CO position may also be filled by a CFH. The Shift Manager is responsible for seeing that the facility operations are conducted in accordance with appropriate station orders, station operating instructions, and Technical Specifications.

A CFH has oversight responsibility for fuel movement in the spent fuel pool.

Each member of the unit staff shall meet or exceed the minimum qualifications recommended in ANSI N18.1-1971.

13.1.2.1.2 Maintenance & Work Control Manager

The Manager of Maintenance & Work Control is responsible for overall management of site maintenance and associated planning. The manager cooperates closely with Operations and other staff managers and supervisors in the scheduling and performance of work. This includes development and supervision of programs for routine and emergency maintenance of all units.

13.1.2.1.3 Radiation Protection, Chemistry, and Environmental Manager

The Manager, Radiation Protection, Chemistry, and Environmental (RPCE), reports to the Plant Manager and is responsible for providing strategic direction for the development of long-term business plans and initiatives in these areas.

13.1.2.1.3.1 ALARA Program and Radiation Protection Manager

The ALARA Program and Radiation Protection Manager (RPM) reports to the RPCE Manager and is responsible for developing, implementing, and managing the ALARA Program and the Radiation Protection (RP) programs for normal and emergency conditions for the site in accordance with ALARA principles and applicable standards and regulations.

The RPM is responsible for providing station RP support to operational, maintenance, and decommissioning activities. In addition, the RPM is responsible for the shipment and disposal of radioactive waste, personnel radiation monitoring measurements, a comprehensive respiratory protection program, self-assessments and corrective actions for the RP program, and the ALARA program. The RPM ensures that adequate protective clothing is available at all times. The RPM is also responsible for properly maintaining all required radiation exposure records for station personnel and visitors.

13.1.2.1.3.2 Chemistry and Hazardous Materials (Hazmat) Manager

The Chemistry and Hazmat Manager reports to the RPCE Manager and has responsibility for chemistry controls for Units 2, 3, and ISFSI, and obtaining chemical and radiological samples for effluent controls. The Chemistry and Hazmat Manager is also responsible for the Hazmat Response Team that serves to protect the public, site personnel, and the environment from an unplanned loss or release of hazardous material on the site.

13.1.2.1.3.3 Environmental Manager

The Environmental Manager reports to the RPCE Manager and oversees compliance with the National Pollutant Discharge Elimination System (NPDES), the San Diego County Air Pollution Control District, and other federal and state environmental regulations and rules.

13.1.3 QUALIFICATION OF NUCLEAR PLANT PERSONNEL

13.1.3.1 Qualification Requirements

The SONGS facility staff has a level of education, experience, and skill, commensurate with their level of responsibility. The qualifications provide reasonable assurance that decisions and actions during the decommissioning of SONGS will not constitute a hazard to the health and safety of the public.

The recommendation of Regulatory Guide 1.8, Revision 1, September 1975, "Personnel Selection and Training," and ANSI N18.1-1971, "Standard for Selection and Training of Personnel for Nuclear Power Plants," are currently used as the basis for establishing minimum non-license related qualifications for all management, supervisory, and professional-technical personnel in the plant organization.

CONDUCT OF OPERATIONS

The education, training, and experience requirements for operators, technicians, and repairmen meet the qualifications for these positions stated in ANSI N18.1-1971. Established company training programs include documented academic and on-the-job training.

13.2 TRAINING

13.2.1 TRAINING PROGRAMS

The Certified Fuel Handler training program was approved by the NRC (Reference 1). Other positions specific training programs are implemented as needed for decommissioning activities.

13.2.2 REFERENCES

1. Letter from M.H. Chernoff (NRC) to T. Palmisano (SCE) dated August 1, 2014, "Approval of Safe Storage Shift Manager / Certified Fuel Handler Training Program."

13.3 EMERGENCY PLANNING

The Permanently Defueled Emergency Plan (PDEP) for SONGS Units 2 and 3 and ISFSI was approved by the NRC letter dated June 8, 2015.

13.4 REVIEW AND AUDIT

Activities affecting nuclear safety are independently reviewed and audited by site organizations other than those directly responsible for the activity. The review and audit program ensures proper review and evaluation is conducted for proposed facility and procedure changes, tests, experiments, and unplanned events. The program complies with the requirements of 10 CFR 50.59 and is conducted in accordance with the recommendations of the Decommissioning Quality Assurance Program (DQAP).

13.4.1 ONSITE REVIEW

A detailed description of the Onsite Review Committee responsibilities and authorities is provided in DQAP Appendix G.

13.4.2 NUCLEAR OVERSIGHT BOARD

A detailed description of the Nuclear Oversight Board responsibilities and authorities is provided in DQAP Appendix G.

13.4.3 AUDIT PROGRAM

The Nuclear Oversight organization performs audits as outlined in the DQAP section titled "Audits," under the cognizance of Director Nuclear Oversight, NRA, and NSC. Audits are performed with a frequency commensurate with their safety significance.

13.5 PLANT PROCEDURES

This section describes administrative and operating procedures that are used by the operating organization to ensure that routine operating, off-normal, and emergency activities are conducted in a safe manner. All safety-related operations are conducted in accordance with detailed written and approved procedures as described in the Permanently Defueled Technical Specifications, Section 5.5.

13.5.1 ADMINISTRATIVE PROCEDURES

13.5.1.1 Preparation of Procedures

Administrative procedures required for the conduct of operations are written to be applicable to SONGS ISFSI as well as SONGS Units 2 and 3, to the maximum extent possible.

13.5.1.2 Procedures

The following are descriptions of the administrative procedures prepared for SONGS Units 2 and 3 as applicable for a permanently defueled unit.

A. Procedures for Certified Fuel Handlers (CFH) and Certified Operators (CO).

The provisions of 10CFR50.54 (i) through (m) are implemented through procedural controls specifying the authorities, responsibilities, and standards for operating personnel.

An administrative document assigns the authority and responsibility for limiting control room access to the on-shift Operations crew. In the event of an emergency, a clear line of authority and responsibility in the control room has been established. The Units 2 and 3 Permanently Defueled Emergency Plan identifies lines of communication and authority for plant management personnel.

B. Equipment control procedures

Equipment control procedures describe the methods for controlling the status of plant equipment. These procedures control equipment removed from service for testing or maintenance, including its return to service.

CONDUCT OF OPERATIONS

C. Control of maintenance and modifications

Maintenance and modification of equipment important to safety is accomplished in accordance with written procedures as described in Paragraph 13.5.2.2.

D. Log book usage and control

Log book usage and control is incorporated in instructions to operators covered under listing A above.

13.5.2 OPERATING AND MAINTENANCE PROCEDURES

13.5.2.1 Control Room / Command Center Operating Procedures

Shift and relief turnover procedures include checklists that assure (a) critical plant parameters are within allowable limits, (b) availability and proper alignment of all systems essential to the prevention and mitigation of transients or a loss of Spent Fuel Pool Cooling, (c) identification of systems and components that are in a degraded mode of operation, and (d) identification of equipment under maintenance or test. Operating procedures are provided for equipment necessary to support the permanently defueled unit.

13.5.2.2 Other Procedures

Other procedures are provided in the following areas as applicable for a permanently defueled unit:

- A. Plant radiation protection procedures are designed to limit and control radiation exposures and the spread of contamination as well as to meet the requirements of 10CFR20 and ALARA.
- B. Emergency preparedness procedures are provided to implement the provisions of the Permanently Defueled Emergency Plan.
- C. Instrument calibration and test procedures provide detailed step-by-step methods for calibration and test, work order documents, acceptance criteria, and testing intervals performed by instrument technicians.
- D. Chemical-radiochemical control procedures provide the instructions to accomplish various chemical and radiochemical analyses and counting techniques.
- E. Radioactive waste management procedures are included in Item A above.

San Onofre 2&3 UFSAR
(DSAR)

CONDUCT OF OPERATIONS

- F. Maintenance procedures provide detailed instructions for important maintenance functions as well as for major evaluations performed by maintenance and technical personnel.
- G. Material control procedures describe the methods used to provide control over the status of purchased material and nonconforming material.
- H. Plant security procedures provide the instructions for implementation of the Security Plan (see Section 13.6).
- I. Fire protection procedures provide the instructions for implementation of the Fire Protection Plan (see the Updated Fire Hazards Analysis).

13.6 INDUSTRIAL SECURITY

The Security Plan is addressed by License Condition E to their respective Operating Licenses.